# /IN THE UNITED STATES BANKRUPTCY COURTFOR THE NORTHERN DISTRICT OF MISSISSIPPI EASTERN DIVISION

IN RE: WOODS, ROBIN CASE NO. 18-10528

### OBJECTION TO PROOF OF CLAIM FILED BY MISSISSIPPI DEPARTMENT OF REVENUE

Now comes Debtor, Robin Woods, by and through their attorney, Catherine Umberger, who files this Objection to Proof of Claim filed by Mississippi Department of Revenue and would show as follows:

- 1. Debtor filed a Voluntary Petition for Chapter 13 Bankruptcy on 2/15/2018.
- 2. Mississippi Department of Revenue filed a Proof of Claim in this case dated 08/09/2018.
- 3. Debtor disputes this amount and demands strict proof of same.
- 4. Debtor disputes the amount owed to Mississippi Department of Revenue due to her having filed her 2016 Tax Return.
- 5. Her 2016 Tax Return shows that she owes \$310 for that year.
- 6. A copy has been sent to Mississippi Department of Revenue.
- 7. Debtor would ask that Mississippi Department of Revenue file an Amended Proof of Claim.
- 8. Debtor should further show that in the event that Mississippi Department of Revenue fails to respond to this objection, that this debt be disallowed, but with Mississippi Department of Revenue having the opportunity to file an amended Proof of Claim.

WHEREFORE, the debtor requests that this honorable court will schedule a hearing on notice and thereafter enter an order fixing the amount of the principal balance that is due to aforesaid creditor.

Dated: October 8, 2018 /s/ Catherine Umberger

Catherine Umberger, ESQ. Attorney for Debtor Mayfield Law Firm, P. A. 106 W. Franklin St. Tupelo, MS 38804 662-841-8844

MS: 104458

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#### UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: WOODS, ROBIN DEBTOR

CHAPTER 13 CASE NO. 18-10528-JDW

#### NOTICE OF OBJECTION TO CLAIM

YOU ARE HEREBY NOTIFIED that a written response to the attached objection to secured claim, etc., must be filed with:

> Shallanda Clay, Clerk of Court US Bankruptcy Court Northern District of Mississippi 703 Hwy 145 North Aberdeen, MS 39730

And a copy must be served on the undersigned Debtor's attorney and the Chapter 13 trustee on or before thirty (30) days from the date of this notice, or the Court may enter a Confirmation Order, which shall set the value of each affected secured creditor's lien, which shall sustain the objection to secured claim, etc., granting the relief requested therein. In the event a written response is filed, the court will notify you of the date, time and place of the hearing thereon.

DATED: 10/8/2018

CHAPTER 13 STANDING TRUSTEE Locke Barkley 6360 I-55 N Ste 140 Jackson, MS 39211

/s/ Catherine Umberger ATTORNEY FOR DEBTOR Mayfield Law Firm, P.A. PO Box 9 **Tupelo**, MS 38802 (662) 841-8844

cu@mayfieldlawfirm.com

## **CERTIFICATE OF SERVICE**

- I, **Catherine Umberger**, the undersigned counsel, do hereby certify that I have this day served a true and correct copy of the foregoing **Objection to Proof of Claim**, via electronic e-mail and/or United States mail, postage prepaid, upon the following:
  - U.S. Trustee USTPRegion05.AB.ECF@usdoj.gov
  - Locke Barkley
  - Mississippi Department of Revenue PO Box 22808 Jackson, MS 39225

DATED: October 8, 2018

<u>/s/Catherine Umberger</u> Catherine Umberger, ESQUIRE